

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

IN RE:

NAHID AHMADPOUR

Debtor.

NATIONWIDE REGISTRY &
SECURITY, LTD.
C/O O'CONNOR & VAUGHN LLC
11490 COMMERCE PARK DR., STE 510
RESTON, VA 20191

Movant,

v.

NAHID AHMADPOUR

Debtor

Laura J. Margulies, Trustee
Respondents.

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Case No: 18-11248 WIL
Chapter 7

**TRUSTEE'S SECOND AMENDED ANSWER
TO THE AMENDED MOTION FOR RELIEF FROM STAY**

COMES NOW Laura J. Margulies, Trustee, and hereby submits this Second Amended Answer to the Amended Motion for Relief from Stay (the "Amended Motion") filed by Nationwide Registry & Security, Ltd. ("Movant"), and respectfully represents as follows:

1. The Chapter 7 Trustee consents to the lifting of the automatic stay to allow the fraudulent conveyance case pending in the Fairfax Circuit Court (Case No. 2010-15001), in Virginia (the "State Court Action") to proceed. The Trustee has filed an Application to Employ Robert L. Vaughn, Jr., Esquire, to represent the estate in the State Court Action.

Dated: June 1, 2018

Respectfully submitted,

/s/Laura J. Margulies
Laura J. Margulies, (#06585)
6205 Executive Blvd.
Rockville, Maryland 20852
(301) 816-1600
trustee@law-margulies.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 1, 2018, a copy of the foregoing Amended Answer To The Amended Motion For Relief From Stay was served electronically via CM/ECF to:

Robert L. Vaughn, Jr., Esq.
rvaughn@oconnorandvaughn.com
Attorney for Movant

Synchrony Bank
c/o PRA Receivables Management
claims@recoverycrop.com

Jon D. Pels
jpels@pelslaw.com
Attorney for Debtor

Kevin D. Judd, Esq.
bkadmin@juddlawfirm.com
Attorney for Debtor

And on June 1, 2018, was served by first class mail, postage prepaid to:

Nahid Ahmadpour
14316 Kings Crossing Blvd
Boyds, MD 20841

Fitzgerald Lewis, Esq.
6066 Leesburg Pike, 4TH Floor
Falls Church, VA 22041
Co-counsel for Movant

/s/Laura J. Margulies
Laura J. Margulies